

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF VIRGINIA  
CHARLOTTESVILLE DIVISION**

BABY DOE, *et al.*, )  
v. )  
Plaintiffs, )  
v. ) Case No. 3:22-cv-49-NKM-JCH  
JOSHUA MAST, *et al.*, )  
Defendants. )  
\_\_\_\_\_  
)

**DEFENDANTS JOSHUA AND STEPHANIE MAST'S MOTION TO SEAL EXHIBIT C  
TO DEFENDANT JOSHUA AND STEPHANIE MAST'S MOTION TO COMPEL**

Pursuant to Local Civil Rule 9 and this Court's Protective Order (ECF No. 26), Defendants Joshua and Stephanie Mast hereby move for an order to seal Exhibit C to their motion to compel responses to their interrogatories (ECF No. 355).

In support of this motion to seal, Defendants Joshua and Stephanie Mast state as follows:

This Court has issued a Protective Order (ECF No. 26) allowing Plaintiffs to proceed under pseudonyms and requiring the parties to use pseudonyms. Exhibit C is John Doe's declaration to USICS that contains John and Jane Does' true names. Accordingly, Defendants Joshua and Stephanie Mast request that the Court order the sealing of Exhibit C, provided to the Court by email.

A proposed Order is attached as Exhibit A to this Motion.

Dated: March 7, 2024

Respectfully submitted,

/s/ Michael Francisco  
John S. Moran (VSB No. 84326)  
Michael L. Francisco (*pro hac vice*)  
MC GUIREWOODS LLP  
888 16th St. N.W., Suite 500

Black Lives Matter Plaza  
Washington, DC 20006  
T: (202) 828-2817  
F: (202) 828-3327  
jmoran@mcguirewoods.com  
mfrancisco@mcguirewoods.com

**CERTIFICATE OF SERVICE**

I hereby certify that on the 7th day of March 2024, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send a notification of such filing to all CM/ECF participants.

Dated: March 7, 2024

Respectfully submitted,

*/s/ Michael Francisco*  
Michael L. Francisco (*pro hac vice*)  
MCGUIREWOODS LLP  
888 16th St. N.W., Suite 500  
Black Lives Matter Plaza  
Washington, DC 20006  
T: (202) 828-2817  
F: (202) 828-3327  
mfrancisco@mcguirewoods.com